

Ross C. Goodman (Bar No. 7722)
GOODMAN LAW GROUP
520 S. Fourth St., 2nd Floor
Las Vegas, Nevada 89101
Telephone: (702) 383-5088
Facsimile: (702) 385-5088

Attorneys for Defendant
D.2801 Westwood, Inc. d/b/a Treasures

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

THEODORE TRAPP, on his own behalf and
on behalf of all others similarly situated,

Plaintiff,

v.

Case No.: 2:09-cv-00995

BIG POPPA'S, LLC, A Nevada limited liability company d/b/a BADDA BING MEN'S CLUB; SKY TOP VENDING, INC., a Nevada Corporation d/b/a CAN CAN ROOM; LA FUENTE, INC., a Nevada corporation d/b/a CHEETAH's; C.P.FOOD AND BEVERAGE, INC., a Nevada corporation d/b/a CLUB PARADISE; DÉJÀ VU SHOWGIRLS OF LAS VEGAS, LLC, a Nevada limited liability company d/b/a DÉJÀ VU SHOWGIRLS; PALOMINO CLUB, INC.; SHAC, LLC, a Nevada limited liability company d/b/a SAPPHIRE; K-KEL, INC., a Nevada corporation d/b/a SPEARMINT RHINO; D.2801 WESTWOOD, INC., a Nevada corporation d/b/a TREASURES; LITTLE DARLINGS OF LAS VEGAS, LLC, a Nevada limited liability company d/b/a LITTLE DARLINGS; O.G. ELIADES, A.D., LLC, a Nevada limited liability company d/b/a OLYMPIC GARDENS; LAS VEGAS ENTERTAINMENT, LLC, a Nevada limited liability company d/b/a LARRY FLYNT's HUSTLER CLUB; MICHAEL A. SALTMAN d/b/a MINXX; RICK'S LAS VEGAS; FRIAS MANAGEMENT, LLC, a Nevada limited liability company d/b/a ACE CAB COMPANY and A-NORTH LAS VEGAS CAB; WESTERN CAB COMPANY, a

**[PROPOSED]
STIPULATION AND ORDER BETWEEN
PLAINTIFF AND DEFENDANT D.2801
WESTWOOD, INC. d/b/a TREASURES
TO EXTEND THE DEADLINE TO FILE
AND SERVE ANSWER OR OTHERWISE
RESPOND TO COMPLAINT**

[SECOND REQUEST]

Nevada corporation d/b/a WESTERN CAB COMPANY and WESTERN LIMOUSINE, NEVADA CHECKER CAB CORPORATION, a Nevada corporation d/b/a CHECKER CAB COMPANY;; NEVADA STAR CABCORPORATION, a Nevada corporation d/b/a STAR CAB COMPANY; NEVADA YELLOW CAB CORPORATION, a Nevada corporation d/b/a YELLOW CAB COMPANY; LUCKY CAB COMPANY OF NEVADA, a Nevada corporation d/b/a LUCKY TRANS; SUN CAB, INC., a Nevada limited liability company d/b/a CLS TRANSPORTATION LAS VEGAS; ON DEMAND SEDAN SERVICES, LLC, a Nevada limited liability company d/b/a ODS LIMOUSINE and ODS CHAUFFEURED TRANSPORTATION; BLS LIMOUSINE SERVICE OF LAS VEGAS, INC., a Nevada corporation d/b/a BLS LIMOUSINE SERVICE OF LAS VEGAS; DESERT CAB, INC., a Nevada corporation d/b/a DESERT CAB COMPANY and ODYSSEY LIMOUSINE; BELL TRANS A NEVADA CORPORATION, a Nevada corporation d/b/a BELL TRANS; TONY CHONG, an individual; and DOE EMPLOYEES 1-1000;

Defendants.

IT IS HEREBY STIPULATED AND AGEED by and between Plaintiff THEODORE TRAPP ("Plaintiff"), through his attorneys JAMES E. SMYTH, II, ESQ., of Kummer, Kaempfer, Bonner, Renshaw & Ferrario, and Defendant D.2801 WESTWOOD, INC., d/b/a TREASURES ("Defendant"), through its attorney, ROSS C. GOODMAN, ESQ. of the Goodman Law Group, that the deadline for Defendant to file a response to Plaintiff's Complaint currently due to be filed on July 20, 2009 shall be extended to Monday, August 10, 2009.

IT IS SO ORDERED.

Dated this ____ day of July, 2009.

PEGGY A. LEEN
United State Magistrate Judge

1 Respectfully submitted,

2 GOODMAN LAW GROUP

KUMMER, KAEMPFER, BONNER,
RENSHAW & FERRARIO

3
4 By: /s/ Ross C. Goodman
Ross C. Goodman, Esq. (Bar No. 7722)
5 520 south Fourth Street, 2nd Floor
Las Vegas, Nevada 89101

By: /s/ James E. Smyth
James E. Smyth, II, Esq. (Bar No. 6506)
3800 Howard Hughes Parkway, 7th Floor
Las Vegas, Nevada 89169

6 *Attorneys for Defendant*
7 *D.2801 Westwood, Inc. d/b/a Treasures*

Jay Edelson, Esq.
Rafey Balabanian, Esq.
KAMBER EDELSON, LLC
350 North LaSalle Street, Suite 1300
Chicago, Illinois 60654

Attorneys for Plaintiff Theodore Trapp

8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

GOODMAN LAW GROUP
A Professional Corporation
520 S. Fourth Street, 2nd Floor
Las Vegas, Nevada 89101
(702) 383-5088

CERTIFICATE OF MAILING

I hereby certify that on the 16th day of July, 2009 the foregoing **STIPULATION AND ORDER BETWEEN PLAINTIFF AND DEFENDANT D.2801 WESTWOOD, INC. d/b/a TREASURES TO EXTEND THE DEADLINE TO FILE AND SERVE ANSWER OR OTHERWISE RESPOND TO COMPLAINT [SECOND REQUEST]** was electronically served upon all attorneys of record in this matter.

/s/

Ross C. Goodman, Esq.
Nevada Bar No. 7722
GOODMAN LAW GROUP
520 South Fourth Street
Las Vegas, Nevada 89101
Telephone: (702)383-5088
Facsimile: (702) 385-5088